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NAS WHITING FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON SITE 16 RECORD OF DECISION NAS WHITING FIELD FL  
9/15/2008  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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September 15, 2008

Mr. Benjamin T. "Tread" Kissam, P.G.  
Department of the Navy  
Naval Facilities Engineering Command Southeast  
Building 903  
NAS Jacksonville  
Jacksonville, Florida 32212-0030

**RE: Record of Decision for Operable Unit 15 – Site 16, Open Disposal and Burning Area, Naval Air Station Whiting Field, Milton, Florida** (Tetra Tech NUS, Inc., March 4, 2008)

Dear Mr. Kissam:

I have reviewed the above document dated March 4, 2008 (received on March 4, 2008). A Record of Decision (ROD) is needed for Site 16 to present the selected remedy for contaminated surface and subsurface soil. The remedial action, Land Use Controls (LUCs), was chosen by the United States Navy (Navy) and United States Environmental Protection Agency (USEPA), with concurrence from the Florida Department of Environmental Protection (FDEP), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). I have the following comments pertaining to this document:

- 1. Section 1.2, Statement Of Basis And Purpose, Page 1-1:** The third sentence should read: "The remedial action was chosen by the United States Navy and USEPA, with concurrence from the Florida Department of Environmental Protection (FDEP), in accordance..." The last sentence, "The Florida Department of Environmental Protection (FDEP) concurs with the selected remedy," should be deleted.
- 2. Section 1.4, Description Of The Selected Remedy, Page 1-4:** The second bullet under the LUC performance objectives should read: "Restrict the site to non-residential use only. Non-residential land use restrictions prohibit residential or residential-like uses, including but not limited to, any form of housing, child-care facilities, any kind of school including pre-schools, elementary schools, and secondary schools, playgrounds, and adult convalescent and nursing care facilities."
- 3. Section 1.4, Description Of The Selected Remedy, Page 1-4:** The third bullet under the LUC performance objectives should read: "Excavation, disturbance, or removal of soils is prohibited unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure which office this would be)."
- 4. Section 1.4, Description Of The Selected Remedy, Page 1-5:** The last paragraph for this section needs to be adjusted. It could be written this way: "The Navy shall prepare, in accordance with USEPA guidance, and submit the document (*instead of "document" please name the document*) to the USEPA and FDEP for review and approval. A LUC Remedial



Design (RD) document, as well as all other post-ROD documents, may also be needed as specified in an Federal Facility Agreement (FFA) and further described in the 2004 Department of Defense/USEPA Principles and Procedures for LUCs and Other Post-ROD Actions (LUC Principles)."

5. **Section 1.5, Statutory Determinations, Page 1-5:** The third sentence should read: "Because this remedy will result in contaminants remaining on site in excess of residential risk-based levels, LUCs will be implemented to restrict the site to non-residential use only. Non-residential land use restrictions prohibit residential or residential-like uses, including but not limited to, any form of housing, child-care facilities, any kind of school including pre-schools, elementary schools, and secondary schools, playgrounds, and adult convalescent and nursing care facilities. Excavation, disturbance, or removal of soils will be prohibited unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be). LUCs are also being implemented to ensure that RAOs are being achieved."
6. **Section 2.1, Site Name, Location, And Description, Page 2-1:** The second sentence of the second paragraph should read: "Ground surface at the site is slightly depressed. It is also encircled and bisected, east to west, by a raised and unimproved dirt road."
7. **Section 2.2.1, NAS Whiting Field History, Page 2-3:** The last sentence of the last paragraph should read: "The current and reasonably anticipated future land use at Site 16 is industrial."
8. **Section 2.2.2, Site 16 History, Page 2-3:** In the first sentence of the fourth paragraph the word "of" should be inserted between the words "disposed" and "at". Also, the third sentence should read: "The soil sampling results revealed subsurface soil PAH concentrations greater than their respective leachability criteria (Note to Mike: Please check this statement because I don't believe it is correct.). Also, benzo(a)pyrene concentrations in both of the samples slightly exceeded its residential direct exposure criteria per FDEP's 62-777 FAC (CH2M Hill Constructors, Inc., December 2002)."
9. **Section 2.4, Scope and Role of Operable Unit 15 – Site 16, Page 2-6:** The last sentence of the first paragraph should read: "The only exceptions to this are those sites subject to the State of Florida's Petroleum Cleanup Program."
10. **Section 2.5.1, Nature and Extent of Contamination, Page 2-7:** This paragraph should read: "As part of the RI conducted for Site 16, data was collected to determine the nature and extent of releases of site-derived contaminants in surface and subsurface soil. Data was also collected to identify potential pathways of migration of contaminants in surface and subsurface soil, and to evaluate risks to human and ecological receptors from these contaminants."
11. **Section 2.5.1.1, Surface Soil, Page 2-7:** The first sentence of the second paragraph should read: "Carcinogenic PAH concentrations exceeded USEPA's PRGs and FDEP's SCTLs."
12. **Section 2.5.3, Migration Pathways, Page 2-9:** The first sentence of the fourth paragraph should read: "The transport of soil, and therefore COCs in soil, by water via the mechanisms of physical transport of soil and the leaching of constituents from soil to groundwater are potential concerns at Site 16."
13. **Section 2.5.4, Current and Potential Future Land and Resource Use, Page 2-9:** The reasonably anticipated future land use at Site 16 should be industrial.
14. **Section 2.6.1.1, Non-Carcinogenic Risk, Page 2-10:** Three of the five risk receptors are mentioned in this section (hypothetical future resident, typical industrial worker, and construction worker). Why aren't the other two, maintenance worker and recreational user/trespasser, also mentioned?



15. **Section 2.6.1.1, Carcinogenic Risk, Page 2-10:** Please give a short explanation (as you did in the Risks from Lead section) as to what the Navy is proposing to do about these risks being above the State's risk level of 1 in a million, or call out the section that does that.
16. **Section 2.6.3, Risk Summary, Page 2-12:** Please clarify the identified risks discussed in paragraph 2 of this section.
17. **Section 2.8, Description Of Alternatives, Page 2-14:** At the end of the fourth sentence please add: "unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be)."
18. **Section 2.8, Description Of Alternatives, Page 2-14:** The fifth and sixth sentences under the Alternative S16-2 portion of this section should read: "The LUCs would also restrict the site to non-residential land use only. Non-Residential land use restrictions prohibit residential or residential-like uses, including but not limited to, any form of housing, child-care facilities, any kind of school including pre-schools, elementary schools, and secondary schools, playgrounds, and adult convalescent and nursing care facilities."
19. **Table 2-2, Page 2-15:** In the Description of Key Components column the implementation of LUCs paragraph should read: "Implement LUCs to address contaminants in soil at concentrations in excess of residential standards. Submit a LUC RD to USEPA and FDEP that will detail the implementation plans to restrict the site to non-residential land use only. Excavation, disturbance, or removal of soils will also be prohibited under these plans unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be)."
20. **Section 2.8, Description Of Alternatives, Page 2-16:** In the last sentence of the first paragraph under the Alternative S16-4 section please add the word "of" between the words "disposed" and "at."
21. **Section 2.10.1, Summary of Rationale for Remedy, Page 2-17:** The third bullet should read: "The reasonably anticipated future land use of the property at Site 16 is industrial."
22. **Section 2.10.2, Remedy Description, Page 2-17:** The second sentence of the first paragraph should read: "These LUCs in the form of ICs and engineering controls (ECs) will be implemented to restrict the site to non-residential use only and will prohibit the excavation, disturbance, or removal of soils unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be). Unacceptable risks from exposure to contaminated soil will be eliminated with the implementation of these LUCs."
23. **Table 2-4, Page 2-19:** In the Soil Alternative 2 column the first row should read: "Would be protective of human receptors. LUCs would prevent unacceptable potential exposure because the site will be restricted to non-residential use only. LUCs would also prohibit excavation, disturbance, or removal of soils from the site unless prior written approval is obtained." The third row should read: "Would provide long-term effectiveness and permanence through LUCs restricting the site to non-residential use only. The LUCs would also prohibit excavation, disturbance, or removal of soils from the site unless prior written approval is obtained. Would require...."
24. **Table 2-4, Page 2-19:** In the Soil Alternative 3 column and Soil Alternative 4 column the third row should read: "... , and implementing LUCs to restrict the site to non-residential use only and to prohibit the excavation, disturbance, or removal of soils from the site unless prior written approval is obtained...."
25. **Section 2.10.2, Remedy Description, Page 2-21:** The first sentence of the second paragraph should read: "ICs restricting the site to non-residential use only, and for prohibiting excavation, disturbance, or removal of soils unless prior written approval is



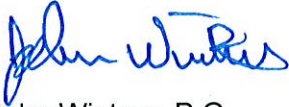
obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be), will be placed on an area of land slightly..."

26. **Section 2.10.2, Remedy Description, Page 2-21:** The second and third bullets under the LUC performance objectives should be revised. The second bullet should read: "Restrict the site to non-residential land use only. Non-Residential land use restrictions prohibit residential or residential-like uses, including but not limited to, any form of housing, child-care facilities, any kind of school including pre-schools, elementary schools, and secondary schools, playgrounds, and adult convalescent and nursing care facilities." The third bullet should read: "Excavation, disturbance, or removal of soils will also be prohibited unless prior approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be)."
27. **Section 2.10.2, Remedy Description, Page 2-23:** The second paragraph under the Engineering Controls section should read: "The LUCs will restrict the site to non-residential use only which will minimize human contact with surface and subsurface soil."
28. **Section 2.10.2, Remedy Description, Page 2-23:** The first sentence of the sixth paragraph under the Engineering Controls section is unclear. The portion of the sentence that states "as the LUC component of the overall RD" should be removed or made clearer.
29. **Section 2.10.4, Expected Outcome of the Selected Remedy, Page 2-25:** The first sentence should read: "Immediately upon implementation of the selected remedy (LUCs), Site 16 will be acceptable for future industrial use."
30. **Section 2.10.4, Expected Outcome of the Selected Remedy, Page 2-25:** The second bullet in this section should read: "Soils remaining in place with concentrations of contaminants above their respective residential soil cleanup target level (SCTL) will require a LUC to restrict the site to non-residential use only. Non-residential land use restrictions prohibit residential or residential-like uses, including but not limited to, any form of housing, child-care facilities, any kind of school including pre-schools, elementary schools, and secondary schools, playgrounds, and adult convalescent and nursing care facilities. Excavation, disturbance, or removal of soils will also be prohibited unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be). These restrictions will be in effect at Site 16 until the concentrations..."
31. **Section 2.11, Statutory Determinations, Page 2-25:** The first sentence should read: "The alternative selected for Site 16, Alternative S16-2, is consistent with..."
32. **Section 2.11.1, Protection of Human Health and the Environment, Page 2-25:** The second sentence should read: "The selected remedy eliminates, reduces, or controls risks by implementing LUCs to: (1) restrict the site to non-residential use only. Non-residential land use restrictions prohibit residential and residential-like uses and (2) prohibit excavation, disturbance, or removal of soils unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be)."
33. **Table 2-6, Page 2-26:** In the Assessment column, first row, the second paragraph should read: "Regulatory controls (i.e., LUCs) will prohibit potential future residents from exposure to soil at the site because residential and residential like uses of the site will be prohibited by the proposed LUCs. LUCs will also prohibit excavation, disturbance, or removal of soils unless prior written approval is obtained from the NAS Whiting Field Environmental Office (I'm not sure what office this would be)."
34. **Section 2.11.3, Cost Effectiveness, Page 2-29:** The first sentence should read: "The selected remedy, Alternative S16-2, is cost-effective..."

Page 5  
Record of Decision  
Naval Air Station Whiting Field, Site 16  
September 15, 2008

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.  
Remedial Project Manager

JJC 

for ESN 